

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	
<b>Watson Valve Services, Inc.</b>	§	<b>Case No. 20-30968</b>
	§	
<b>Debtor.</b>	§	<b>Chapter 11</b>

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**FIRST MONTHLY FEE STATEMENT OF MCDOWELL HETHERINGTON,  
LLP, AS COUNSEL FOR DEBTOR AND DEBTORS IN POSSESSION, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM FEBRUARY 6, 2020 TO FEBRUARY 29, 2020**

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<b>Name of Applicant:</b>	McDowell Hetherington, LLP
<b>Date of Retention:</b>	February 6, 2020
<b>Period for which Fees and Expenses are Incurred:</b>	February 6 – February 29, 2020
<b>Interim Fees Incurred:</b>	\$ 79,297.25
<b>Interment Payment of Fees Requested (80%):</b>	\$ 63,437.80
<b>Interim Expenses Incurred:</b>	\$ 1,209.52
<b>Total Fees and Expenses Due:<sup>1</sup></b>	\$ 64,647.32

This is the First Monthly Fee Statement.

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<sup>1</sup> Pursuant to this Court's Order pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 120], if no objection to the fees or expenses sought in the Monthly Statement is received by the expiration of the objection deadline, the Debtor is authorized to promptly pay 80% of the fees and 100% of the expenses identified in the Monthly Statement. Parties have fourteen days to object.

McDowell Hetherington, LLP (“**MH**”), as Counsel for Debtor and Debtor in Possession of Watson Valve Services, Inc. (“**Debtor**”) submits this First Monthly Fee Statement (“**Fee Statement**”) for the period from February 6, 2020 through February 29, 2020 (“**Application Period**”) in accordance with the Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 120] (“**Interim Compensation Order**”).

MH requests compensation for professional services rendered in the amount of \$79,297.25 (“**Fees**”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,209.52 (“**Expenses**”), for the period from February 7, 2020 through February 29, 2020. Eighty percent (80%) of the fees equals \$63,437.80 and one hundred percent (100%) of the Expenses equals \$1,209.52 for a total requested amount of \$64,647.32. A summary of the time expended by MH attorneys and paralegals, together with their respective hourly rates is attached as **Exhibit A**. A summary of the fees by project category are attached as **Exhibit B**. A summary of expenses is attached as **Exhibit C**. The invoice for fees and expenses incurred during the Application Period is attached as **Exhibit D**. MH is currently holding \$66,566 in retainer.

### **NOTICE**

Pursuant to the Order Establish Interim Professional Compensation Procedures [Bk. Dkt. No. 120], notice of this Fee Statement will be provided to (i) the Office of the United States Trustee for the Southern District of Texas; (ii) Husch Blackwell as counsel for Texas Capital Bank, the secured lender; and (iii) counsel for the January 24 Claimants Committee

in the Watson Grinding & Manufacturing Co. bankruptcy case, Case No. 20-30967, pending before this Court.

**PRAYER**

WHEREFORE, MH respectfully requests payment and reimbursement in accordance with the procedures set forth in the Interim Compensation Order (i.e., payment of compensation for professional services rendered) as follows:

<b>Fees (80%)</b>	\$ 63,437.80
<b>Expenses (100%)</b>	<u>\$ 1,209.52</u>
<b>Total Interim Request</b>	<b><u>\$ 64,647.32</u></b>

The Debtor respectfully requests that this Court grant the relief requested to use cash collateral on an interim basis and for such other and further relief to which the it is entitled.

Dated: April 7, 2020

Respectfully submitted,

MCDOWELL HETHERINGTON LLP

By: /s/ Jarrod B. Martin

Jarrold B. Martin

Texas Bar No. 24070221

Kate H. Easterling

Texas Bar No. 24053257

Avi Moshenberg

Texas Bar No. 24083532

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*Counsel for Watson Valve Services, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 7, 2020 a true and correct copy of the foregoing Fee Statement was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system, and via email on the following parties:

**Counsel for the US Trustee**

Stephen Statham

[Stephen.Statham@usdoj.gov](mailto:Stephen.Statham@usdoj.gov)

**Counsel for the Secured Lender**

Tim Million

[tim.million@huschblackwell.com](mailto:tim.million@huschblackwell.com)

**Counsel for the January 24 Claimants Committee**

Josh Wolfshohl

[JWolfshohl@porterhedges.com](mailto:JWolfshohl@porterhedges.com)

/s/ Jarrod B. Martin

Jarrod B. Martin

# **Exhibit A**

# EXHIBIT A

TIMEKEEPER SUMMARY			
Timekeeper	Rate/Hour	Hours	Total
Jarrold B. Martin (JBM)	\$ 425.00	85.30	\$ 36,252.50
Kate H. Easterling (KHE)	\$ 415.00	38.70	\$ 16,060.50
Avi Mosehenberg (AVM)	\$ 385.00	15.80	\$ 6,083.00
Nick R. Lawson (NRL)	\$ 385.00	2.90	\$ 1,116.50
Jennifer H. Frank (JHF)	\$ 375.00	0.50	\$ 187.50
Nicole E. Su (NES)	\$ 300.00	2.80	\$ 840.00
Jarrold B. Martin (JBM)	\$ 212.50	6.90	\$ 1,466.25
Lara A. Coleman (LAC)	\$ 195.00	86.10	\$ 16,789.50
Katherine E. Taylor (KET)	\$ 195.00	1.70	\$ 331.50
<b>TOTAL:</b>		<b>240.70</b>	<b>\$ 79,127.25</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 328.74</b>		

# Exhibit B

## EXHIBIT B

CASE ADMINISTRATION			
Timekeeper	Rate/Hour	Hours	Total
Jarrold B. Martin (JBM)	\$ 425.00	36.40	\$ 15,470.00
Kate H. Easterling (KHE)	\$ 415.00	18.10	\$ 7,511.50
Avi Mosehenberg (AVM)	\$ 385.00	12.10	\$ 4,658.50
Jarrold B. Martin (JBM)	\$ 212.50	4.00	\$ 850.00
Lara A. Coleman (LAC)	\$ 195.00	41.70	\$ 8,131.50
Katherine E. Taylor (KET)	\$ 195.00	0.80	\$ 156.00
<b>TOTALS:</b>		<b>113.10</b>	<b>\$ 36,777.50</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 325.18</b>		

ASSET ANALYSIS AND RECOVERY			
Timekeeper	Rate/Hour	Hours	Total
Jarrold B. Martin (JBM)	\$ 425.00	1.70	\$ 722.50
Jennifer H. Frank (JHF)	\$ 375.00	0.50	\$ 187.50
<b>TOTALS:</b>		<b>2.20</b>	<b>\$ 910.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 413.64</b>		

RELIEF FROM STAY / ADEQUATE PROTECTION			
Timekeeper	Rate/Hour	Hours	Total
Jarrold B. Martin (JBM)	\$ 425.00	0.10	\$ 42.50
Lara A. Coleman (LAC)	\$ 195.00	0.20	\$ 39.00
<b>TOTALS:</b>		<b>0.30</b>	<b>\$ 81.50</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 271.67</b>		

MEETINGS AND COMMUNICATIONS WITH CREDITORS			
Timekeeper	Rate/Hour	Hours	Total
Jarrold B. Martin (JBM)	\$ 425.00	2.00	\$ 850.00
Kate H. Easterling (KHE)	\$ 415.00	0.60	\$ 249.00
Avi Mosehenberg (AVM)	\$ 385.00	2.80	\$ 1,078.00
<b>TOTALS:</b>		<b>5.40</b>	<b>\$ 2,177.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 403.15</b>		



**EMPLOYMENT AND FEE APPLICATIONS**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	4.00	\$ 1,700.00
<b>TOTALS:</b>		<b>4.00</b>	<b>\$ 1,700.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 425.00</b>		

**COMPROMISE AND SETTLEMENT**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	2.00	\$ 850.00
Lara A. Coleman (LAC)	\$ 195.00	1.50	\$ 292.50
<b>TOTALS:</b>		<b>3.50</b>	<b>\$ 1,142.50</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 326.43</b>		

**LITIGATION**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	2.40	\$ 1,020.00
Kate H. Easterling (KHE)	\$ 415.00	20.00	\$ 8,300.00
Avi Mosehenberg (AVM)	\$ 385.00	0.90	\$ 346.50
Lara A. Coleman (LAC)	\$ 195.00	14.50	\$ 2,827.50
<b>TOTALS:</b>		<b>37.80</b>	<b>\$ 12,494.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 330.53</b>		

**BUSINESS OPERATIONS**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	10.10	\$ 4,292.50
Nick R. Lawson (NRL)	\$ 385.00	2.90	\$ 1,116.50
Lara A. Coleman (LAC)	\$ 195.00	10.80	\$ 2,106.00
<b>TOTALS:</b>		<b>23.80</b>	<b>\$ 7,515.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 315.76</b>		

**FINANCING AND CASH COLLATERAL**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	17.20	\$ 7,310.00
Jarrold B. Martin (JBM)	\$ 213.00	2.90	\$ 617.70
Lara A. Coleman (LAC)	\$ 195.00	13.30	\$ 2,593.50
Katherine E. Taylor (KET)	\$ 195.00	0.90	\$ 175.50
<b>TOTALS:</b>		<b>34.30</b>	<b>\$ 10,696.70</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 311.86</b>		

**CLAIMS ADMINISTRATION AND OBJECTIONS**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	0.10	\$ 42.50
Lara A. Coleman (LAC)	\$ 195.00	4.10	\$ 799.50
<b>TOTALS:</b>		<b>4.20</b>	<b>\$ 842.00</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 200.48</b>		

**PLAN AND DISCLOSURE STATEMENT**

<b>Timekeeper</b>	<b>Rate/Hour</b>	<b>Hours</b>	<b>Total</b>
Jarrold B. Martin (JBM)	\$ 425.00	9.30	\$ 3,952.50
Nicole E. Su (NES)	\$ 300.00	2.80	\$ 840.00
<b>TOTALS:</b>		<b>12.10</b>	<b>\$ 4,792.50</b>
<b>AVERAGE HOURLY RATE:</b>	<b>\$ 396.07</b>		

# Exhibit C

## EXHIBIT C

EXPENSE SUMMARY		
Copying	\$	593.90
Delivery services/messengers	\$	47.85
Postage	\$	100.80
Local travel	\$	211.97
Trial transcripts	\$	72.00
Other professionals	\$	11.00
Color Photocopies	\$	172.00
<b>TOTAL EXPENSES:</b>	<b>\$</b>	<b><u>1,209.52</u></b>

# Exhibit D

## McDowell Hetherington LLP

1001 Fannin Street  
Suite 2700  
Houston, TX 77002  
(713) 337-5580 Tax I.D. 26-3672762

February 29, 2020

Watson Valve  
Watson Valve

Invoice No. 81810  
Our File No. 7059-000001  
Billing Through: 2/29/20

Ch.11 Bankruptcy

## FOR PROFESSIONAL SERVICES RENDERED

2/7/20	AVM	Case Administration: Review and analyze draft declaration of Robert White (.6); communicate with attorneys representing plaintiffs in various actions against client about the bankruptcy petition and upcoming steps (1.6).	2.20 hrs	385 / hr	847.00
2/10/20	AVM	Case Administration: Review and analyze filings relating to upcoming hearing before Judge Isgur (.4); communicate with cocounsel about the hearing and develop strategy going forward (.3); communicate with attorneys for interested parties about the bankruptcy proceedings (.4).	1.10 hrs	385 / hr	423.50
2/11/20	AVM	Case Administration: communicate with reporter for the Wall Street Journal about the hearing (.2); communicate with cocounsel about the discussion and develop strategy (.2); review and revise press statement (.3); review and analyze notice of appearance (.1); communicate with attorneys about developments in bankruptcy proceedings (.9); review and analyze various Court filings from the day (.4); review and analyze ethics opinion received regarding alleged potential conflict of interest (.4).	2.50 hrs	385 / hr	962.50
2/12/20	AVM	Case Administration: Review and analyze various Court filings from the day (.2); review and analyze letters from litigation-defense counsel and the TCEQ about needing to removing propylene within five days (.4); review and analyze communications from plaintiffs' attorneys about the TCEQ letter (.7).	1.30 hrs	385 / hr	500.50
2/13/20	AVM	Case Administration: review and analyze Court filings from the day (.4); prepare for and participate in call with the TCEQ about removing propylene to understand its position in case emergency motions for injunctive relief are filed (1.6); review and analyze communications from the attorney's for Western/Mattheson about removing the propylene (.2).	2.20 hrs	385 / hr	847.00
2/14/20	AVM	Case Administration: review and analyze Court filings and communications with counsel for defense and plaintiffs regarding the TCEQ issue (.6).	0.60 hrs	385 / hr	231.00
2/17/20	AVM	Case Administration: Review and analyze	2.20 hrs	385 / hr	847.00

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		communications from Western/Mattheson's attorney refusing to remove propylene (.3); communicate with cocounsel about this issue and the obligations under the indemnitor agreement (.7); review and analyze filings to Court from weekend and the day (.5); communicate with attorneys for interested parties about bankruptcy proceedings (.7).			
2/6/20	JBM	Case Administration: Travel from Debtor's command center after bankruptcy filing meeting.	0.30 hrs	213 / hr	63.75
2/6/20	JBM	Case Administration: Phone call with potential counsel for committee.	0.20 hrs	425 / hr	85.00
2/6/20	JBM	Case Administration: Meeting with client regarding final preparation of bankruptcy	4.00 hrs	425 / hr	1,700.00
2/6/20	JBM	Case Administration: Draft and revise notice of designation of complex case.	0.60 hrs	425 / hr	255.00
2/6/20	JBM	Case Administration: Draft and revise motion for joint administration.	1.20 hrs	425 / hr	510.00
2/6/20	JBM	Case Administration: Phone calls with E. Jones and B. White regarding Russia contract.	0.50 hrs	425 / hr	212.50
2/6/20	JBM	Case Administration: Phone call with representative of plaintiff group regarding agreed order.	0.30 hrs	425 / hr	127.50
2/7/20	JBM	Case Administration: Attention to correspondence relating to Texas Attorney General.	0.10 hrs	425 / hr	42.50
2/7/20	JBM	Case Administration: Review and revise complex case designation.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Case Administration: Phone call with J. Melko regarding interested purchaser.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Case Administration: Revise cash management order.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Case Administration: Participate in litigation team conference call and explain bankruptcy process.	0.50 hrs	425 / hr	212.50
2/7/20	JBM	Case Administration: Working session regarding revisions to declaration and preparation for first-day hearing.	3.00 hrs	425 / hr	1,275.00
2/7/20	JBM	Case Administration: Correspondence with plaintiff's attorney regarding stay violation and nonsuit of litigation.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Case Administration: Revise motion for joint administration.	0.30 hrs	425 / hr	127.50
2/8/20	JBM	Case Administration: Phone call with J. White regarding China project.	0.10 hrs	425 / hr	42.50
2/8/20	JBM	Case Administration: Finalize motion for joint administration and cash management.	0.50 hrs	425 / hr	212.50
2/8/20	JBM	Case Administration: Revisions to declaration to address insurance information.	0.30 hrs	425 / hr	127.50
2/8/20	JBM	Case Administration: Phone call with co-counsel regarding declaration and litigation strategy.	0.50 hrs	425 / hr	212.50
2/8/20	JBM	Case Administration: Phone call with R. White regarding declaration revisions.	0.10 hrs	425 / hr	42.50
2/9/20	JBM	Case Administration: Draft and revise agenda.	0.20 hrs	425 / hr	85.00
2/9/20	JBM	Case Administration: Draft and revise status	0.30 hrs	425 / hr	127.50

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		report.			
2/9/20	JBM	Case Administration: Preparation for first day hearing.	2.30 hrs	425 / hr	977.50
2/9/20	JBM	Case Administration: Draft opening statement for first day hearing.	0.20 hrs	425 / hr	85.00
2/9/20	JBM	Case Administration: Draft and revise witness and exhibit list.	0.20 hrs	425 / hr	85.00
2/10/20	JBM	Case Administration: Attend first-day hearings.	2.00 hrs	425 / hr	850.00
2/10/20	JBM	Case Administration: Working session regarding preparation for first-day hearing.	1.50 hrs	425 / hr	637.50
2/10/20	JBM	Case Administration: Working session with E. Jones regarding representation of entities and cash collateral after hearing.	2.00 hrs	425 / hr	850.00
2/11/20	JBM	Case Administration: Phone call with J. White regarding customers reactions to bankruptcy and need for DIP loan.	0.30 hrs	425 / hr	127.50
2/11/20	JBM	Case Administration: Review and respond to emails with US Trustee regarding noticing of committee.	0.20 hrs	425 / hr	85.00
2/11/20	JBM	Case Administration: Meeting with E. Jones regarding retention of entities, oversecured status of bank, and formation of committee.	0.50 hrs	425 / hr	212.50
2/11/20	JBM	Case Administration: Correspondence with defense counsel regarding first-day hearing.	0.20 hrs	425 / hr	85.00
2/12/20	JBM	Case Administration: Travel to Westin for case strategy meeting.	0.50 hrs	213 / hr	106.25
2/12/20	JBM	Case Administration: Meeting with C. Johnson regarding committee pitch.	1.20 hrs	425 / hr	510.00
2/12/20	JBM	Case Administration: Phone call with E. Geiger regarding insurance policies.	0.30 hrs	425 / hr	127.50
2/13/20	JBM	Case Administration: Draft agenda for hearing.	0.20 hrs	425 / hr	85.00
2/13/20	JBM	Case Administration: Telephone conference with TCEQ regarding removal of tank.	0.50 hrs	425 / hr	212.50
2/13/20	JBM	Case Administration: Phone call with H. Flores regarding motions to be heard at February 14 hearing (.1); conference regarding same (.1) .	0.20 hrs	425 / hr	85.00
2/13/20	JBM	Case Administration: Numerous phone calls with T. Million regarding cash collateral.	0.50 hrs	425 / hr	212.50
2/13/20	JBM	Case Administration: Phone call with J. McCoy regarding TCEQ issues.	0.40 hrs	425 / hr	170.00
2/14/20	JBM	Case Administration: Draft motion to withdraw appearance.	0.50 hrs	425 / hr	212.50
2/14/20	JBM	Case Administration: Phone call with co-counsel regarding February 14 hearing.	0.70 hrs	425 / hr	297.50
2/14/20	JBM	Case Administration: Draft witness and exhibit list.	0.10 hrs	425 / hr	42.50
2/16/20	JBM	Case Administration: Draft insurance motion.	1.90 hrs	425 / hr	807.50
2/17/20	JBM	Case Administration: Travel to Debtor's base of operations for meeting regarding retention of professionals and reorganization plan.	0.50 hrs	213 / hr	106.25
2/17/20	JBM	Case Administration: Travel from Debtor's base of operations for meeting regarding retention of professionals and reorganization plan.	0.50 hrs	213 / hr	106.25
2/17/20	JBM	Case Administration: Phone call with co-counsel regarding TCEQ gas removal.	0.30 hrs	425 / hr	127.50
2/18/20	JBM	Case Administration: Travel to Courthouse from	0.50 hrs	213 / hr	106.25



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		hearing on preliminary injunction.			
2/18/20	JBM	Case Administration: Travel to Courthouse for hearing on preliminary injunction.	0.50 hrs	213 / hr	106.25
2/18/20	JBM	Case Administration: Await docket call on injunction motion.	0.30 hrs	425 / hr	127.50
2/18/20	JBM	Case Administration: Review preliminary injunction motion.	0.20 hrs	425 / hr	85.00
2/18/20	JBM	Case Administration: Phone call with co-counsel regarding TCEQ removal.	0.40 hrs	425 / hr	170.00
2/18/20	JBM	Case Administration: Draft agenda for February 19 hearing.	0.10 hrs	425 / hr	42.50
2/18/20	JBM	Case Administration: Meeting with interested parties regarding TCEQ gas removal.	0.80 hrs	425 / hr	340.00
2/18/20	JBM	Case Administration: Attend hearing on TCEQ injunction.	0.50 hrs	425 / hr	212.50
2/19/20	JBM	Case Administration: Meeting with debtor team regarding TCEQ removal issues.	0.50 hrs	425 / hr	212.50
2/19/20	JBM	Case Administration: Review and respond to emails from litigation counsel for Grinding and counsel for Matheson regarding removal of gas.	0.20 hrs	425 / hr	85.00
2/20/20	JBM	Case Administration: Travel from Westin to office after working session.	0.50 hrs	213 / hr	106.25
2/21/20	JBM	Case Administration: Phone call with counsel for Watson Grinding regarding cash collateral.	0.30 hrs	425 / hr	127.50
2/24/20	JBM	Case Administration: Phone calls with co-counsel and client regarding retention of financial advisor.	0.50 hrs	425 / hr	212.50
2/25/20	JBM	Case Administration: Phone call with co-counsel regarding cash collateral and other case issues.	0.70 hrs	425 / hr	297.50
2/26/20	JBM	Case Administration: Travel to Westin Memorial for meeting with management team and financial advisor regarding Watson Valve business operations.	0.70 hrs	213 / hr	148.75
2/26/20	JBM	Case Administration: Phone call with counsel for Watson Grinding regarding case strategy.	0.60 hrs	425 / hr	255.00
2/26/20	JBM	Case Administration: Correspondence with IT professional regarding access to Debtor records.	0.40 hrs	425 / hr	170.00
2/26/20	JBM	Case Administration: Prepare for phone call with counsel for Grinding committee regarding case status (.5); phone call regarding case status (.4).	0.90 hrs	425 / hr	382.50
2/27/20	JBM	Case Administration: Phone call with Watson Grinding regarding TCEQ and site status.	0.30 hrs	425 / hr	127.50
2/10/20	KET	Case Administration: Prepare for hearing on first day motions.	0.80 hrs	195 / hr	156.00
2/10/20	KHE	Case Administration: Prepared for and attended hearing (2.6); developed strategy regarding next steps (1.4); analyzed issues raised by the court and developed strategy for moving forward (2.7); attention to communications with opposing counsel and updates to service list (.3).	7.00 hrs	415 / hr	2,905.00
2/13/20	KHE	Case Administration: Analyzed communications regarding TCEQ demand, draining the propylene from tank, removing other tanks, and upcoming site visits; attention to updates to the service list and communications regarding	1.70 hrs	415 / hr	705.50

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		adding counsel for certain claimants to the service list; analyzed issues for upcoming hearing.			
2/14/20	KHE	Case Administration: Analyzed various motions and notices in advance of hearing (.8) ; analyzed communications regarding inspection and testing of propylene tank and gas (.7); analyzed requests from counsel regarding service lists and attention to ensuring service lists are updated accordingly (.6); analyzed, edited, and revised motion to withdraw as counsel for Watson Grinding (.4); developed strategy for next steps (.2).	2.70 hrs	415 / hr	1,120.50
2/15/20	KHE	Case Administration: Analyzed communications with counsel regarding Texas Center for Environmental Quality and site inspection.	0.30 hrs	415 / hr	124.50
2/16/20	KHE	Case Administration: Analyzed communications with counsel regarding removal of tanks, sampling and draining tank contents.	0.30 hrs	415 / hr	124.50
2/17/20	KHE	Case Administration: Analyzed communications regarding status of site inspection and TCEQ demand to remove propylene gas from tanks (1.3); analysis regarding grounds for emergency motion to compel Western Gas to remove gas from tank (.9).	2.20 hrs	415 / hr	913.00
2/18/20	KHE	Case Administration: Communications with claimant's counsel regarding status of site visit and TCEQ demand (.5); analyzed communications regarding TCEQ requirements and scheduled site visit (.6); analyzed TCEQ's motion for preliminary injunction (.4); analyzed communications with the court regarding setting hearing for emergency motion for injunction (.2); attended hearing ,by telephone, on TCEQ's emergency motion and attention to effect of same (.7); analyzed notifications and documents filed in the bankruptcy proceeding (.3).	2.70 hrs	415 / hr	1,120.50
2/19/20	KHE	Case Administration: Analyzed communications regarding testing and site inspections.	0.30 hrs	415 / hr	124.50
2/20/20	KHE	Case Administration: Analyzed communications regarding sample collection.	0.60 hrs	415 / hr	249.00
2/24/20	KHE	Case Administration: Analyzed communications regarding samples, testing, and objections to same.	0.30 hrs	415 / hr	124.50
2/6/20	LAC	Case Administration: Prepare master creditor list (.5); draft notice of appearance for K. Easterling (.3); revise notice of designation as complex case (.1); draft proposed order for same (.2)	1.10 hrs	195 / hr	214.50
2/7/20	LAC	Case Administration: Work on motion for joint administration (.5); finalize proposed order for same (.2); conference with J. Martin regarding same (.1); revise motion to extend schedules and statement of financial affairs (.6); revise proposed order regarding same (.1); email to S. Stathan regarding notice of complex case designation (.1); conference regarding first day motions (.5); finalize motion regarding extension of scheduling deadlines (.3); finalize	3.40 hrs	195 / hr	663.00

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		proposed order regarding same (.1); finalize motion for joint administration (.3); finalize proposed order regarding same (.1); update service list (.5).			
2/8/20	LAC	Case Administration: Work on declaration for R. White (.8); exchange numerous emails with working group regarding same (.3); work on master service list and outline deadlines set forth in complex case designation rules related to same (.6); work on cash management motion (1.1); work on proposed order related to same (.6); work on motion for joint administration (.9); work on proposed order for joint administration motion (.2); finalize notice of designation of complex chapter 11 cases (.2); work on motion to extend time for filing schedules, statement of financial affairs, and related documents (.8); draft notice of hearing (.6); email from S. Stratham regarding proposed order (.1); revise proposed order to incorporate S. Stratham's comments (.4); prepare service email regarding notice of designation, declaration of R. White; emergency motion for joint administration, emergency motion for continuation of cash management system, emergency motion to extend deadlines to file schedules, revised proposed order, and notice of hearing (.3); conference with J. Martin regarding strategy for following days (.7).	7.60 hrs	195 / hr	1,482.00
2/9/20	LAC	Case Administration: Prepare master service list in anticipation of complex case designation (8); exchange emails with M. Snow regarding utilities (.2); discussion with R. White regarding same (.1); work on motion to compromise (.3); work on proposed order regarding same (.1); prepare witness and exhibit list for hearing on February 10 (.6); draft agenda for hearing on February 10 (.5); work on status report for hearing on February 10 (.3); begin preparing for hearing on February 10 (4.1); ; prepare email to service group regarding status report and agenda (.1); email to L. Do regarding same (.1); conference with J. Martin regarding strategy moving forward (.3).	7.50 hrs	195 / hr	1,462.50
2/10/20	LAC	Case Administration: Prepare for hearing on first day motions, including exhibit binders, materials for attorney use at hearing and coordination of same.	4.60 hrs	195 / hr	897.00
2/10/20	LAC	Case Administration: Research regarding claims agents and local rules regarding appointment of same (.4); email to KCC regarding proposal for noticing and claims agent duties (.1); email to Epiq regarding proposal for noticing and claims agent duties (.1); email to PrimeClerk regarding proposal for noticing and claims agent duties (.1); telephone call from R. Jordan regarding Watson matter and services available (.3); telephone call from K. Desgrosseilliers regarding Epiq regarding service available,	1.80 hrs	195 / hr	351.00

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		pricing, and proposal (.4); review broad proposal from KCC (.2); review proposal from Epiq (.2).			
2/11/20	LAC	Case Administration: Draft notice of withdrawal (.6); begin outlining utilities motion (.4); prepare transcript request for hearing on February 10 (.2); attention to correspondence with potential noticing agents (.2).	1.40 hrs	195 / hr	273.00
2/12/20	LAC	Case Administration: Conference call with J. Martin regarding February 14 hearing, reclamation motion, cash collateral, wage issues, and TEQ visit.	0.20 hrs	195 / hr	39.00
2/13/20	LAC	Case Administration: Work on master service list (1.2); prepare gathering materials for hearing and exhibit binders for February 14 hearing (.9); work on declaration of B. White (.2); ; work on agenda for hearing on February 14 (.5); ; revise proposed order regarding extension of schedules (.2); attention to correspondence with working group regarding February 14 hearing (.8); strategize regarding litigation and additional motions (.3);	4.10 hrs	195 / hr	799.50
2/14/20	LAC	Case Administration: Draft letter to USBC regarding electronic filing declaration (.3); ; draft witness and exhibit list (.3); prepare hearing and exhibit binders for use at hearing on February 14 (2.1); draft motion to withdraw appearances (.5); draft proposed order regarding same (.2); conference with K. Easterling regarding same (.1); conference regarding strategy (.3); update master service list (.4); prepare insurance documents for distribution (.3).	4.50 hrs	195 / hr	877.50
2/17/20	LAC	Case Administration: Strategize for hearing set for February 19 (.3); conference with J. Martin and A. Moshenberg regarding utilities, tank removal, and litigation moving forward (.5).	0.80 hrs	195 / hr	156.00
2/18/20	LAC	Case Administration: Prepare witness and exhibit list for February 19 hearing (.4); prepare documentation and exhibits for hearing (1.7).	2.10 hrs	195 / hr	409.50
2/20/20	LAC	Case Administration: Analysis of docket regarding appearances (.6); update master service list in accordance with same (.9).	1.50 hrs	195 / hr	292.50
2/24/20	LAC	Case Administration: Conference regarding master service list, notices of appearance, potential show cause motion for violation of stay, and litigation (.3); emails with K. Easterling regarding plaintiffs' lawyers and service issues (.1).	0.40 hrs	195 / hr	78.00
2/27/20	LAC	Case Administration: Analysis of docket regarding new notice of appearances (.2); prepare revised master service list (.5).	0.70 hrs	195 / hr	136.50
2/13/20	JBM	Asset Analysis and Recovery: Meeting with potential purchaser regarding bankruptcy sale.	0.50 hrs	425 / hr	212.50
2/28/20	JBM	Asset Analysis and Recovery: Phone call with counsel for Watson Grinding and Texas Capital Bank regarding turnover of insurance proceeds.	0.70 hrs	425 / hr	297.50
2/28/20	JBM	Asset Analysis and Recovery: Prepare order	0.50 hrs	425 / hr	212.50

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		regarding turnover of insurance proceeds.			
2/6/20	JHF	Asset Analysis and Recovery: Confer with K. Easterling, J. Martin and B. Aiken regarding potential issues and strategies.	0.50 hrs	375 / hr	187.50
2/26/20	JBM	Relief from Stay and Adequate Protection: Correspondence with purported creditor regarding stay violation.	0.10 hrs	425 / hr	42.50
2/26/20	LAC	Relief from Stay and Adequate Protection: Conference with J. Martin regarding relief from stay violations related to state court litigation.	0.20 hrs	195 / hr	39.00
2/17/20	AVM	Meetings and Communications with Creditors: Review and analyze communications between attorneys for creditors, Watson Grinding, TCEQ, and Mattheson regarding the removal of substances from the facility.	0.40 hrs	385 / hr	154.00
2/18/20	AVM	Meetings and Communications with Creditors: Review and analyze filings and communications from the day between the Court and the attorneys (.3); communicate with attorneys for interested parties about bankruptcy (.4).	0.70 hrs	385 / hr	269.50
2/18/20	AVM	Meetings and Communications with Creditors: Communicate with attorneys representing plaintiffs about the status of the bankruptcy proceedings and creation of creditors committee (.8); review and analyze filings relating to emergency removal of substances from the Watson Grinding facility (.6); review and analyze communications from counsel for creditors and counsel for TCEQ about the removal of substances from Watson Grinding facility (.3).	1.70 hrs	385 / hr	654.50
2/9/20	JBM	Meetings and Communications with Creditors: Draft customer letter regarding status of bankruptcy.	0.30 hrs	425 / hr	127.50
2/10/20	JBM	Meetings and Communications with Creditors: Revise and email letters to customers regarding bankruptcy filing.	0.40 hrs	425 / hr	170.00
2/11/20	JBM	Meetings and Communications with Creditors: Revise reclamation motion.	0.60 hrs	425 / hr	255.00
2/11/20	JBM	Meetings and Communications with Creditors: Revise reclamation order.	0.30 hrs	425 / hr	127.50
2/20/20	JBM	Meetings and Communications with Creditors: Phone call with counsel for Corvette dealership regarding issues getting to storage space of Corvette.	0.40 hrs	425 / hr	170.00
2/20/20	KHE	Meetings and Communications with Creditors: Prepared for and attended teleconference with counsel for Houston Corvette Service regarding access to his business and property.	0.60 hrs	415 / hr	249.00
2/12/20	JBM	Employment and Fee Applications: Meeting with US Trustee regarding retention.	0.30 hrs	425 / hr	127.50
2/17/20	JBM	Employment and Fee Applications: Phone call with financial advisor regarding retention.	0.40 hrs	425 / hr	170.00
2/20/20	JBM	Employment and Fee Applications: Working session with management and counsel for Watson Grinding regarding engagement of financial advisor and general case strategy.	2.20 hrs	425 / hr	935.00

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2/23/20	JBM	Employment and Fee Applications: Revise engagement letter for Macco as financial advisor.	0.40 hrs	425 / hr	170.00
2/24/20	JBM	Employment and Fee Applications: Phone call with financial advisor regarding revisions to engagement letter.	0.20 hrs	425 / hr	85.00
2/10/20	JBM	Employment and Fee Applications Objections: Meeting with US Trustee trial attorney regarding retention applications.	0.50 hrs	425 / hr	212.50
2/7/20	JBM	Compromise & Settlement: Draft motion to compromise with Texas Capital Bank.	1.00 hrs	425 / hr	425.00
2/8/20	JBM	Compromise & Settlement: Conference call with Texas Capital's attorney and co-counsel regarding cash collateral and settlement.	0.20 hrs	425 / hr	85.00
2/9/20	JBM	Compromise & Settlement: Finalize motion to compromise with Texas Capital Bank.	0.60 hrs	425 / hr	255.00
2/9/20	JBM	Compromise & Settlement: Draft proffer for compromise hearing.	0.20 hrs	425 / hr	85.00
2/7/20	LAC	Compromise & Settlement: Analysis of UCCs for Texas Capital (.2); draft motion to compromise with Texas Capital (1.1); email to J. Martin regarding same and proposed order (.1).	1.40 hrs	195 / hr	273.00
2/9/20	LAC	Compromise & Settlement: Prepare email to service group regarding motion to compromise.	0.10 hrs	195 / hr	19.50
2/11/20	AVM	Litigation: Review and analyze caselaw on where wrongful death claims must be litigated when the defendant is a debtor in bankruptcy.	0.90 hrs	385 / hr	346.50
2/7/20	JBM	Litigation: Respond to correspondence relating to TROs.	0.10 hrs	425 / hr	42.50
2/7/20	JBM	Litigation: Phone call with counsel for litigant regarding TRO.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Litigation: Review and respond to correspondence from special litigation counsel regarding hearing preparation.	0.20 hrs	425 / hr	85.00
2/7/20	JBM	Litigation: Correspondence with special litigation counsel regarding suggestions of bankruptcy.	0.10 hrs	425 / hr	42.50
2/7/20	JBM	Litigation: Conference regarding litigation workflow.	0.30 hrs	425 / hr	127.50
2/11/20	JBM	Litigation: Research regarding removal standards for personal injury litigation.	1.00 hrs	425 / hr	425.00
2/12/20	JBM	Litigation: Phone call with J. McCoy regarding bankruptcy litigation options.	0.50 hrs	425 / hr	212.50
2/6/20	KHE	Litigation: Analyzed documents for bankruptcy filings (.9); analyzed dockets for additional lawsuits filed to ensure suggestion of bankruptcy is filed in all pending litigation (1.1); attention to communications with state court regarding bankruptcy stay and effect on non-debtor defendants (.2); analyzed communications regarding insurance adjuster's request for site inspection and issues with same (.4); analyzed authority regarding extension of stay on cases involving non-debtors (1.2); developed strategy regarding enforcing stay and potential removal of state court actions (1.1).	4.90 hrs	415 / hr	2,033.50
2/7/20	KHE	Litigation: Prepared for and attended site visit	5.70 hrs	415 / hr	2,365.50



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		with J. McCoy and discussed status of documenting assets at the site (3.1); met with R. White and J. Watson regarding next steps and issues for upcoming hearing (.4); researched issues regarding bankruptcy removal and extending stay (1.2); communications with E. Egendorf regarding representation of estate of deceased and getting on service list (.5); developed strategy for upcoming hearings and bankruptcy filings (.5).			
2/11/20	KHE	Litigation: Analyzed new lawsuits filed in state court against non-debtors arising out of the Watson explosion (.6); analyzed authority and arguments for removal of lawsuits against non-debtors (1.1); analyzed authority regarding "related to" jurisdiction in bankruptcy court (.9); developed strategy regarding notices of removal and timing of same (.4); analysis of instructions from the court regarding motions and matters to discuss in upcoming hearing and developed strategy regarding same (.9); communications regarding contract between Watson and Matheson and/or Western International Gas (.3); communications with claimants counsel regarding upcoming site view and January 24 Claimants Committee (1.2).	5.40 hrs	415 / hr	2,241.00
2/12/20	KHE	Litigation: Analyzed communications from claimants' counsel (1.1); analyzed authority related to removal and potential issues regarding related lawsuits and developed strategy for next steps (2.9).	4.00 hrs	415 / hr	1,660.00
2/6/20	LAC	Litigation: Finalize suggestions of bankruptcy for Figueroa (.2), Ferrufino (.2), Young (.2), Ferrell (.2), Cruz (.2), Cortez (.2), Ayala (.2), Avitia (.2), Andrus (.2), Burnam (.2), Trejo (.2), Pelcastre (.2), Juarez (.2), Rufino (.2), Reagle (.2), Wallingsford (.2), Rangel (.2), Olvera (.2), Navarro (.2), Miranda (.2), Gutierrez (.2), Horton (.2), Harris County (.2), Goff (.2), and Flores (.2); analysis of Le case in state court; prepare case summary, including parties, causes of action and counsel (.6); draft suggestion of bankruptcy for Le (.2).	5.80 hrs	195 / hr	1,131.00
2/6/20	LAC	Litigation: Finalize suggestions of bankruptcy for Goff (.2), Flores (.2), Horton (.2), Gutierrez (.2), Miranda (.2), Olvera (.2), Rangel (.2), Rufion (.2), Juarez (.2), Pelcastre (.2), Trejo (.2), La (.2), Andrus (.2), Avitia (.2), Ayala (.2), Cruz (.2), Ferrufino (.2), Figueroa (.2), and Wallingsford (.2); draft suggestion of bankruptcy for Le (.2); conference with K. Easterling regarding new litigation (.1).	4.10 hrs	195 / hr	799.50
2/7/20	LAC	Litigation: Analysis of state court docket regarding additional litigation (.6); conference with J. Martin regarding post-bankruptcy filing of state court suit (.2); prepare case information sheet for Revuelta (.3); telephone call with district court clerk regarding Olvera and	2.00 hrs	195 / hr	390.00

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		Ferrufino suggestions of bankruptcy (.4); email to working group regarding issues related to same (.1); review updated state court litigation workbook (.2); email to J. Franks regarding same and including explanation of new litigation (.1); prepare suggestion of bankruptcy for La (.1).			
2/11/20	LAC	Litigation: Update state court litigation workbook; attention to emails with S. Statham and J. Martin regarding same.	0.80 hrs	195 / hr	156.00
2/26/20	LAC	Litigation: Analysis of Huynh state court docket (.1); update litigation workbook (.3); draft suggestion of bankruptcy for Huynh matter (.5); analysis of Abdulla state court docket (.1); update litigation workbook (.3); draft suggestion of bankruptcy for Abdulla matter (.5);	1.80 hrs	195 / hr	351.00
2/13/20	JBM	Business Operations: Work on employee wage motion.	1.60 hrs	425 / hr	680.00
2/14/20	JBM	Business Operations: Conference call with Chinese contract counterparties regarding bankruptcy.	1.00 hrs	425 / hr	425.00
2/17/20	JBM	Business Operations: Phone call with counsel for Watson Grinding regarding payroll issues.	0.50 hrs	425 / hr	212.50
2/17/20	JBM	Business Operations: Phone call with controller regarding payroll.	0.90 hrs	425 / hr	382.50
2/18/20	JBM	Business Operations: Phone call with controller regarding payroll issues.	0.20 hrs	425 / hr	85.00
2/18/20	JBM	Business Operations: Draft letter to Chinese company regarding contract assumption.	0.30 hrs	425 / hr	127.50
2/18/20	JBM	Business Operations: Draft letter to Polymetal regarding contract termination.	0.20 hrs	425 / hr	85.00
2/18/20	JBM	Business Operations: Phone call with co-counsel regarding business income insurance.	0.50 hrs	425 / hr	212.50
2/19/20	JBM	Business Operations: Draft letters to customers regarding contract assumption and rejection.	0.50 hrs	425 / hr	212.50
2/26/20	JBM	Business Operations: Revise cash-flow budget.	0.30 hrs	425 / hr	127.50
2/26/20	JBM	Business Operations: Meeting with management and financial advisor regarding Watson Valve business operations.	3.00 hrs	425 / hr	1,275.00
2/27/20	JBM	Business Operations: Conference with counsel for Watson Grinding, management, and financial advisor after cash collateral hearing regarding business operations.	0.70 hrs	425 / hr	297.50
2/28/20	JBM	Business Operations: Meeting with proposed counsel for Chinese company regarding completion of Valve project.	0.40 hrs	425 / hr	170.00
2/7/20	LAC	Business Operations: Conference call with M. Snow regarding wage motion (.8); exchange emails with M. Snow regarding same (.2); continued work on wage motion (1.4).	2.40 hrs	195 / hr	468.00
2/8/20	LAC	Business Operations: Prepare memo outlining questions regarding flexible spending account related to motion to pay prepetition wages benefits, and taxes (.8); respond to email from M. Snow regarding wage and benefit information (.4); continued work on wage motion (.7); outline issues related to wages,	2.80 hrs	195 / hr	546.00



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		benefits, and taxes (.4); conference with N. Lawson regarding employment law issues related to exempt v. non-exempt employees, contracts, 401k plan, FSA benefits, and tax issues (.5).			
2/10/20	LAC	Business Operations: Exchange emails with M. Snow regarding wages, benefits, and contacts for benefits and 401(k) plan (.1); telephone call to L. Morales at HRP Benefits Administration regarding questions related to wage and benefit programs (.1); telephone call from W. Brewster, general counsel of HRP regarding same and need for conference call to coordinate information (.3); conference call with W. Brewster and N. Lawson regarding wages, employment contracts, benefits, and flexible spending account (.5); telephone call with T. Rising at the Standard regarding 401k plan and need for conference call regarding same (.1).	1.10 hrs	195 / hr	214.50
2/11/20	LAC	Business Operations: Conference with N. Lawson regarding employee and wage issues.	0.50 hrs	195 / hr	97.50
2/11/20	LAC	Business Operations: Email to W. Brewster and M. Snow regarding benefits and wage information (.1); email to R. Rising regarding 401k information (.1).	0.20 hrs	195 / hr	39.00
2/13/20	LAC	Business Operations: Conference regarding wage issues.	0.50 hrs	195 / hr	97.50
2/17/20	LAC	Business Operations: Strategize with J. Martin regarding wages, benefits, and separation of common paymaster (.6); telephone conference with M. Snow and HR&P regarding same (.6); additional conference with J. Martin regarding clarification and plan moving forward with cash collateral/management (.2).	1.40 hrs	195 / hr	273.00
2/18/20	LAC	Business Operations: Work on cash management motion (1.5) and proposed order regarding same (.4).	1.90 hrs	195 / hr	370.50
2/8/20	NRL	Business Operations: Develop strategy for employee benefits management during bankruptcy proceedings.	0.90 hrs	385 / hr	346.50
2/10/20	NRL	Business Operations: Strategy meeting with L. Coleman regarding employee benefits and pensions (.2); call with L. Coleman and outside human resources vender regarding the same (.2); research on employee benefits and pensions pending bankruptcy (1.6);	2.00 hrs	385 / hr	770.00
2/6/20	JBM	Financing and Cash Collateral: Correspondence with counsel for Texas Capital regarding cash collateral order.	0.20 hrs	425 / hr	85.00
2/11/20	JBM	Financing and Cash Collateral: Phone call with counsel for property damage claimants regarding cash collateral.	0.20 hrs	425 / hr	85.00
2/11/20	JBM	Financing and Cash Collateral: Revise cash collateral order.	0.70 hrs	425 / hr	297.50
2/11/20	JBM	Financing and Cash Collateral: Revise cash collateral motion.	0.50 hrs	425 / hr	212.50
2/12/20	JBM	Financing and Cash Collateral: Correspondence	0.10 hrs	425 / hr	42.50

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		with T. Million regarding cash collateral.			
2/12/20	JBM	Financing and Cash Collateral: Work on cash collateral motion.	1.50 hrs	425 / hr	637.50
2/13/20	JBM	Financing and Cash Collateral: Work on limited cash collateral motion.	2.00 hrs	425 / hr	850.00
2/13/20	JBM	Financing and Cash Collateral: Meeting with management regarding cash collateral budget.	1.90 hrs	425 / hr	807.50
2/13/20	JBM	Financing and Cash Collateral: Conference with management regarding DIP loans.	0.70 hrs	425 / hr	297.50
2/14/20	JBM	Financing and Cash Collateral: Travel to hearing on cash collateral.	0.50 hrs	213 / hr	106.25
2/14/20	JBM	Financing and Cash Collateral: Travel from hearing on motion to use cash collateral.	0.50 hrs	213 / hr	106.25
2/14/20	JBM	Financing and Cash Collateral: Attend and prevail at hearing on motion to use cash collateral.	1.50 hrs	425 / hr	637.50
2/14/20	JBM	Financing and Cash Collateral: Revise order approving use of cash collateral.	0.30 hrs	425 / hr	127.50
2/14/20	JBM	Financing and Cash Collateral: Meeting with litigation team prior to hearing on motion to use cash collateral.	1.50 hrs	425 / hr	637.50
2/15/20	JBM	Financing and Cash Collateral: Revise cash collateral motion regarding operations.	1.10 hrs	425 / hr	467.50
2/17/20	JBM	Financing and Cash Collateral: Conference regarding revisions to motion to use cash collateral.	0.50 hrs	425 / hr	212.50
2/17/20	JBM	Financing and Cash Collateral: Strategize in relation to issues pertaining to payroll issues and budget.	0.30 hrs	425 / hr	127.50
2/17/20	JBM	Financing and Cash Collateral: Revise cash collateral motion.	0.50 hrs	425 / hr	212.50
2/17/20	JBM	Financing and Cash Collateral: Revise cash management motion.	0.30 hrs	425 / hr	127.50
2/19/20	JBM	Financing and Cash Collateral: Travel to hearing on motion to use cash collateral and motion to maintain cash management system.	0.40 hrs	213 / hr	85.00
2/19/20	JBM	Financing and Cash Collateral: Travel from hearing on motion to use cash collateral and motion to maintain cash management system.	0.50 hrs	213 / hr	106.25
2/19/20	JBM	Financing and Cash Collateral: Attend and prevail at hearing on motion to use cash collateral and motion to maintain cash management system.	0.50 hrs	425 / hr	212.50
2/19/20	JBM	Financing and Cash Collateral: Await docket call on motion to use cash collateral.	0.30 hrs	425 / hr	127.50
2/25/20	JBM	Financing and Cash Collateral: Review and respond to emails from counsel for Texas Capital regarding cash collateral budget.	0.20 hrs	425 / hr	85.00
2/26/20	JBM	Financing and Cash Collateral: Draft motion to use cash collateral.	0.60 hrs	425 / hr	255.00
2/26/20	JBM	Financing and Cash Collateral: Revise cash collateral motion.	0.30 hrs	425 / hr	127.50
2/27/20	JBM	Financing and Cash Collateral: Travel to hearing on motion to use cash collateral and cash management.	0.50 hrs	213 / hr	106.25
2/27/20	JBM	Financing and Cash Collateral: Travel from	0.50 hrs	213 / hr	106.25

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			hearing on motion to use cash collateral.				
2/27/20	JBM	Financing and Cash Collateral: Phone call with counsel for Watson Grinding regarding cash collateral hearing.	0.30 hrs	425 / hr		127.50	
2/27/20	JBM	Financing and Cash Collateral: Meeting with committee counsel and management team prior to cash collateral hearing.	0.70 hrs	425 / hr		297.50	
2/27/20	JBM	Financing and Cash Collateral: Attend hearing on motion to use cash collateral.	0.50 hrs	425 / hr		212.50	
2/27/20	KET	Financing and Cash Collateral: Prepare documents and exhibits for hearing.	0.90 hrs	195 / hr		175.50	
2/11/20	LAC	Financing and Cash Collateral: Review and provide comments to cash collateral order.	0.50 hrs	195 / hr		97.50	
2/13/20	LAC	Financing and Cash Collateral: Work on emergency motion to use cash collateral (2.8); work on proposed order regarding same (1.4); prepare exhibits for motion for cash collateral (1.6).	5.80 hrs	195 / hr		1,131.00	
2/14/20	LAC	Financing and Cash Collateral: Prepare monthly payroll exhibit for hearing on February 14.	0.90 hrs	195 / hr		175.50	
2/18/20	LAC	Financing and Cash Collateral: Work on cash collateral motion (.8) and proposed order regarding same (.3).	1.10 hrs	195 / hr		214.50	
2/19/20	LAC	Financing and Cash Collateral: Email from J. Martin regarding proposed order for cash collateral motion (.1); revise proposed order in accordance with S. Statham's comments (.2); email to J. Martin regarding same (.1).	0.40 hrs	195 / hr		78.00	
2/26/20	LAC	Financing and Cash Collateral: Prepare budget for third emergency cash collateral motion (.8); revise proposed budget (.6); work on third emergency cash collateral motion (.7); revise proposed budget (.3); draft witness and exhibit list for hearing on March 27; (.4); prepare exhibits and materials for hearing binders (.9); draft agenda for hearing on March 27 (.3); receive comments from T. Million regarding comments to cash collateral agreement (.1); incorporate T. Million's comments into cash collateral motion (.1) and proposed order (.1); receive from email to counsel for January 24 creditor's committee regarding cash collateral motion (.1); email from A. Power regarding proposed revisions to cash collateral order (.1); revise cash collateral motion in accordance with A. Power's comments (.2).	4.60 hrs	195 / hr		897.00	
2/7/20	JBM	Claims Administration and Objections: Correspondence with reclamation claimant regarding claim.	0.10 hrs	425 / hr		42.50	
2/7/20	LAC	Claims Administration and Objections: Review letter from Groves Supply regarding reclamation (.1); conference regarding reclamation motion (.1).	0.20 hrs	195 / hr		39.00	
2/9/20	LAC	Claims Administration and Objections: Discussion with J. Martin regarding reclamation motion (.2); research regarding same (.2); draft reclamation motion (2.3); draft proposed order	3.30 hrs	195 / hr		643.50	

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		for same (.6).			
2/11/20	LAC	Claims Administration and Objections: Continued work on motion regarding reclamation claims (.4) and proposed order regarding same (.2).	0.60 hrs	195 / hr	117.00
2/12/20	JBM	Plan and Disclosure Statement: Working meeting with Debtor's management regarding restructuring plan for Watson Valve.	3.50 hrs	425 / hr	1,487.50
2/13/20	JBM	Plan and Disclosure Statement: Working session regarding bankruptcy reorganization strategy for Watson Valve.	3.30 hrs	425 / hr	1,402.50
2/17/20	JBM	Plan and Disclosure Statement: Working session with management team regarding reorganization plan.	1.40 hrs	425 / hr	595.00
2/27/20	JBM	Plan and Disclosure Statement: Meeting with committee counsel regarding potential plan options.	1.10 hrs	425 / hr	467.50
2/24/20	NES	Plan and Disclosure Statement: Analyze channeling injunctions used in mass tort litigation for case strategy.	2.80 hrs	300 / hr	840.00

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
AVM Moshenberg, Avi	15.80	385.00	\$6,083.00
JBM Martin, Jarrod B	6.90	212.50	\$1,466.25
JBM Martin, Jarrod B	85.30	425.00	\$36,252.50
JHF Frank, Jennifer H	0.50	375.00	\$187.50
KET Taylor, Katherine E.	1.70	195.00	\$331.50
KHE Easterling, Kate	38.70	415.00	\$16,060.50
LAC Coleman, Lara A	86.10	195.00	\$16,789.50
NES Su, Nicole E	2.80	300.00	\$840.00
NRL Lawson, Nick R	2.90	385.00	\$1,116.50
Total fees for this matter	240.70 hrs		\$79,127.25

## DISBURSEMENTS

1/31/20	Other professionals - Secretary of State Searches	2.00
2/3/20	Local travel - J. Martin parking to meet with Client	12.00
2/5/20	Local travel - J. Martin parking to meet with Client	8.00
2/7/20	Local travel - J. Martin uber to meet with Murphy	15.38
2/7/20	Local travel - J. Martin working meal	71.08
2/12/20	Local travel - J. Martin lyft to meet with Client	24.78
2/13/20	Local travel - J. Martin parking to meet with Client	16.00
2/14/20	Local travel - J. Martin parking to meet with Client	16.00

Watson Valve Services	7059 - 000001	Invoice No. 81810	Page 16
2/18/20	Local travel - K. Easterling uber to attend court hearing		15.32
2/18/20	Trial transcripts - Judicial Transcribers - Invoice no. 61689		72.00
2/25/20	Delivery services/messengers - Mach 5		12.95
2/25/20	Delivery services/messengers - Mach 5		12.95
2/25/20	Delivery services/messengers - Mach 5		21.95
2/26/20	Local travel - J. Martin to attend meeting		33.41
2/29/20	Photocopy Expenses		0.50
2/29/20	Copy Expenses		429.80
2/29/20	Copy Expenses		163.60
2/29/20	Postage		44.00
2/29/20	Postage		56.80
2/29/20	Other professionals - Secretary of State Searches		9.00
2/29/20	Color Copy Expenses		172.00
Disbursement Summary			
	Copying		593.90
	Delivery services/messengers		47.85
	Postage		100.80
	Local travel		211.97
	Trial transcripts		72.00
	Other professionals		11.00
	Color Photocopies		172.00
	Total disbursements for this matter		<u>\$1,209.52</u>

## BILLING SUMMARY

TOTAL FEES	\$79,127.25
TOTAL DISBURSEMENTS	<u>\$1,209.52</u>
TOTAL CHARGES FOR THIS BILL	<u>\$80,336.77</u>
TOTAL BALANCE NOW DUE	<u><u>\$80,336.77</u></u>

## Wiring Instructions:

Independent Bank 750 Bering Drive, Suite 100 Houston, Texas 77057

Bank Acct. Name: McDowell Hetherington LLP

Routing No.: 111916326 Bank Acct.: 017087